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Before the
Federal Communication Commission
Washington, D.C. 20554

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JUL 29 1993

MAIL BRANCH

In the Matter of)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)

PR Docket 92-235

REPLY COMMENTS OF THE
ILLINOIS DEPARTMENT OF TRANSPORTATION

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The Illinois Department of Transportation commends the Commission on its' desire to increase the availability of spectrum to users with the needs that cannot be met under the current regulations. We fully support the implementation of new technology and techniques for frequency allocation to maximize use of the spectrum available to land mobile users.


BACKGROUND:

The Illinois Department of Transportation Communication system is comprised of approximately 3600 mobile radios. In the Chicago area we operate high band and UHF systems that covers 6 county area. Approximately 1200 radios currently operating in this area would be drastically affected by this proposal. Throughout the rest of the state we have approximately 2400 low band mobiles. The Illinois Department of Transportation Communication System has been developed over a number of years and represents in an investment of over \$20 million.

Specific Reply Comments:

Reply to Land Mobile Communication Council (LMCC)

The Illinois Department of Transportation is represented by AASHTO, a member of the LMCC, and in general we support the LMCC's requests to extend the time table these changes would be implemented over. However, on Page 8 of the LMCC comments paragraph d requests the ability to begin allowing licensing of full power operation on offset channels on January 1, 1996. This proposal has the potential to greatly impact the operations of current users. We feel the pressures that will be brought to bear on coordinators, and their local representatives will out weigh the interests of current users. Current licenses with large existing systems will not be afforded an opportunity to budget for, properly plan and develop systems that will reject the high power adjacent channel operations. While we support the Commission in its' attempts to increase spectrum utilization, we ~~feel~~ the Commission should consider the impacts of implementing this



Reply to Comments Submitted by Illinois APCO

On page 6 of Illinois APCO's comments they ask that APCO be recognized as the sole coordinator for all public safety frequencies with the exception of frequencies in the 450 Mhz range where they support continued use of IMSA. Our experience has shown the experience and knowledge of the needs of the transportation community possessed by AASHTO provide superior service to meet our needs. We have found that APCO does not always regard the needs of transportation services with the